

The Honorable James L. Robart

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Maria Mora-Villalpando,

Plaintiff,

v.

U.S. Immigration and Customs Enforcement  
and U.S. Customs and Border Protection,  
and U.S. Citizenship and Immigration  
Services,

Defendants.

CASE NO. C18-655-JLR

JOINT STATUS REPORT

The parties hereby file this Joint Status Report as required by the Court's Order on the parties' previous joint status report (Dkt. #58). The Court ordered the parties to provide a joint status report within sixty days concerning their progress with the Court's rulings.

With respect to the Second Request, U.S. Immigration and Customs Enforcement ("ICE") conducted a search of the Office of Principal Legal Advisor ("OPLA") Case Management System ("OCMS PLANet") as ordered by the Court. The parties agreed to search terms on December 6, 2019. ICE has completed the searches in the OCMS PLANet database using the keywords to which

1 the parties agreed and pulled records that fell within the relevant date range. ICE is currently  
 2 conducting a responsiveness review of the records. To the extent that any of the records are  
 3 responsive, ICE will start processing and producing any responsive records on a rolling basis in  
 4 April, with the first production being made by April 30, 2020.

5  
 6 In addition, U.S. Customs and Immigration Services (“USCIS”) will retrieve all files that  
 7 were ingested into the Enterprise Document Management System (“EDMS”) on or after January 20,  
 8 2017 and contain at least one I-213 form. Once those files are retrieved, USCIS will search the I-  
 9 213s that were created on or after January 20, 2017 for any of the search terms agreed upon by  
 10 plaintiff and USCIS. Once USCIS has conducted the search and determined what, if any, documents  
 11 are found and responsive to plaintiff’s request, then defense counsel will inform plaintiff’s counsel  
 12 of when USCIS anticipates producing responsive records.  
 13

14 To keep the Court apprised, the parties propose to provide the Court with another Joint Status  
 15 Report within 60 days of the Court’s order on this Joint Status Report, unless the Court orders  
 16 otherwise.  
 17

18 Dated this 3<sup>rd</sup> day of April, 2020.

19  
 20 /s/ Khaled Alrabe  
 21 Khaled Alrabe, NY Bar Reg. 5542311  
 22 (admitted *pro hac vice*)  
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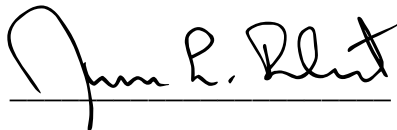
s/ Brian C. Kipnis  
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**ORDER**

The parties will submit another joint status report within 60 days of the date of this order.

Dated this 7th day of April, 2020.

A handwritten signature in black ink, appearing to read "James L. Robart", written over a horizontal line.

James L. Robart  
United States District Judge